

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

GREENWICH INSURANCE COMPANY,

Plaintiff,

-against-

US ALL STAR FEDERATION d/b/a IASF,

Defendant.

Case No. 2:23-cv-02285-JTF-atc

**DECLARATION OF KRISTEN C. KISH IN SUPPORT OF GREENWICH INSURANCE  
COMPANY'S UNOPPOSED MOTION FOR LEAVE TO AMEND ITS COMPLAINT**

I, Kristen C. Kish, pursuant to 28 U.S.C. § 1746 hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge.

2. I am special counsel at the law firm of Mound Cotton Wollan & Greengrass LLP, attorneys for the plaintiff Greenwich Insurance Company ("Greenwich").

3. I am admitted to this Court *pro hac vice* in connection with the above-referenced matter.

4. I submit this Declaration in support of Greenwich's Unopposed Motion for Leave to File an Amended Complaint.

5. Attached hereto as "Exhibit 1" is Greenwich's proposed First Amended Complaint with redlined revisions.

6. Attached hereto as "Exhibit 2" is a true and correct copy of the complaint filed in the matter captioned *John Doe I v. Varsity Spirit, LLC et al.*, as Case No. CV 23 984774 in the Court of Common Pleas, Cuyahoga County, Ohio.

7. Attached hereto as “Exhibit 3” is a true and correct copy of Greenwich’s October 6, 2023 letter to Defendant US All Star Federation d/b/a IASF (“USASF”).

8. Attached hereto as “Exhibit 4” is a true and correct copy of Amended Petition filed in the case captioned *Jane Doe v. Texas Wolverine All-Stars, Inc., et. al*, filed as Case No. 2022CI19481, in the 225th Judicial District Court, Bexar County, Texas.

9. Attached hereto as “Exhibit 5” is a true and correct copy of Greenwich’s October 25, 2023 letter to USASF.

I hereby declare under penalty of perjury this 26th day of October 2023 that the foregoing is true and correct.

/s/ Kristen C. Kish  
Kristen C. Kish